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6 Attorney for Carla Peterson

7 **UNITED STATES DISTRICT COURT**
8 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 CARLA PETERSON,

14 Defendant.

Case No. 2:19-cr-00119-JAD-NJK

**THIRD STIPULATION TO
MODIFY PRETRIAL RELEASE
CONDITIONS¹**

16 IT IS HEREBY STIPULATED AND AGREED, by and between United States Attorney
17 Nicholas A. Trutanich and Assistant United States Attorney Christopher Burton, counsel for the
18 United States of America, and Federal Public Defender Rene L. Valladares and Assistant Federal
19 Public Defender Sylvia Irvin, counsel for Carla Peterson, that her conditions of release be
20 modified for the following reasons:

21 1. On June 6, 2018, Ms. Peterson made her initial appearance and was released on a
22 personal recognizance bond with specified conditions of pretrial release. *See* ECF No. 13. On
23 February 20, 2020, Ms. Peterson entered a plea of guilty pursuant to a negotiated plea agreement.
24 *See* ECF Nos. 37-39. At a hearing later that afternoon, she was admitted into the RISE Court
25 program. *See* ECF Nos. 40-41.

27

¹ This motion is timely filed. There is no deadline for the filing of this motion.

1 2. As a participant in RISE, Ms. Peterson is subject to her RISE Court contract (ECF
2 No. 41) and conditions of pretrial release including that “The defendant is allowed to travel with
3 prior approval from Pretrial Services.” ECF Nos. 35, ¶74; 13.

4 3. Undersigned counsel previously asked the Court to modify Ms. Peterson’s travel
5 restriction to allow her to travel for work, first within certain states, and then within the
6 continental United States. ECF Nos. 64, 67. This Court granted the modifications. ECF Nos. 65,
7 68.

8 4. Ms. Peterson now asks this Court to travel with her daughter for a personal trip to
9 Maui from December 22-28, 2020. Before Ms. Peterson travels, she understands that she must
10 first consult and abide by the State of Hawaii’s policies and restrictions for travel.

11 5. Undersigned defense counsel consulted with the Pretrial Services Officer Samira
12 Barlow, and she agrees with the modification of Ms. Peterson’s travel for this trip.

13 6. Defense counsel and Government counsel agree to the modification of this
14 pretrial condition.

15 7. Ms. Peterson continues to be in compliance with her pretrial release conditions.

16 DATED this 15th day of December, 2020.

17 RENE L. VALLADARES
18 Federal Public Defender

19 NICHOLAS A. TRUTANICH
20 United States Attorney

21 */s/ Sylvia Irvin*
22 By _____
23 SYLVIA IRVIN
24 Assistant Federal Public Defender

25 */s/ Christopher Burton*
26 By _____
27 CHRISTOPHER BURTON
 Assistant United States Attorney

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,
Plaintiff,
v.
CARLA PETERSON,
Defendants.

Case No. 2:19-cr-00119-JAD-NJK

ORDER

Based on the Stipulation of counsel and good cause appearing,
IT IS THEREFORE ORDERED that following modifications shall be made to Ms.
Peterson's release conditions:

1. The defendant may travel to Maui from December 22-28, 2020.

DATED this 15th day of December, 2020.

~~UNITED STATES MAGISTRATE JUDGE~~